IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 17-16496

James D. Houston, Sr. : Chapter 13

: Judge Jean K. FitzSimon

Debtor(s) : **************

:

Wells Fargo Bank, N.A.

:

Movant,

vs

James D. Houston, Sr. : Cynthia B Houston :

Scott F. Waterman

Respondents.

WELLS FARGO BANK, N.A.'S NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC

Wells Fargo Bank, N.A. ("Creditor") by and through undersigned counsel, hereby submits Notice to the Court of James D. Houston, Sr. ("Debtor") request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor has requested a forbearance period of 3 months and has elected to not tender payments to Creditor that would have come due on the mortgage starting April 1, 2020 through June 1, 2020, and will resume payments beginning July 1, 2020. Creditor holds a secured interest in the real property commonly known as 180 Farmbrook Dr, Levittown, PA 19055.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Debtor will be required to cure the delinquency created by the forbearance period. If Debtor fails to make arrangements to fully cure any arrears resulting from the forbearance period, Creditor reserves the ability to seek relief from the automatic stay upon

expiration of the forbearance period.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181 Attorneys for Creditor

The case attorney for this file is Karina

Velter.

Contact email is kvelter@manleydeas.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Wells Fargo Bank, N.A.'s Notice of Debtor's Request for Forbearance Due to the COVID-19 Pandemic was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Scott F. Waterman, Chapter 13 Trustee, Chapter 13 Trustee, 2901 St. Lawrence Ave., Reading, PA 19606

Brad J. Sadek, Attorney for James D. Houston, Sr., Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on May 12, 2020:

James D. Houston, Sr., 180 Farmbrook Drive, Levittown, PA 19055

James D. Houston, Sr. and Cynthia B Houston, 180 Farmbrook Dr, Levittown, PA 19055

DATE: May 12, 2020

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

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